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From: Meyer, Dan
To: Jacob Odekirk; Kyle Heitkamp; Thomas Mosher
Cc: Hardesty, Doug
Bcc: Johansen, Amy; Vergeront, Julie
Subject: RE: PotlatchDeltic Discussion
Date: Monday, November 23, 2020 10:47:00 AM
Attachments: image001.png
201120 6 PotlatchDeltic mNSR Analysis App A Limits.xlsx

Thank Jacob. How about we meet tomorrow, Tuesday? Doug and I are available after 10:30 am pacific. During the call, we'll explain the calculations in the attached workbook and the basis for revising the daily and annual limits for PCWR-PM-SH (BH-2) and PCWR-PM-SD (BH-3) as illustrated below given the 2020 source test results. I think no more than an hour is needed for the meeting. Let me know what time works best for you tomorrow after 10:30 am pacific, and I'll send out an MS Teams meeting invite. If some other day/time is preferable, let me know that too. Thanks.

3.8 Emissions shall not exceed the daily emission limits in Table 3-1. Unless otherwise required in this permit, compliance with these limits is determined by multiplying each emission factor in Table 3-1 (pounds per unit of operation) by the daily operation specified in Table 3-1, except as required in Condition 3.11.

Table 3-1 – Daily PM2.5 Emission Limits, pounds per day

Emission Unit	Emission Limit	Emission Factor, units	Operation
LK-6	9.52	0.0510 lb/mbf lumber	Condition 4.2.5
PB-1	15.37	0.01488 lb/mlb steam	Condition 4.4.1
PB-2	16.98	0.00722 lb/mlb steam	Condition 4.4.1
PCWR-PM-SH	~~19.75~~6.53	~~0.8229~~0.0026~~3~~ lb/~~hr~~mbf	Condition 4.5.4
PCWR-PM-SD	~~17.77~~5.77	~~0.7406~~0.0022~~9~~ lb/~~hr~~mbf	Condition 4.5.4
PCWR-PM-PTB	3.95	0.1646 lb/hr	Condition 4.5.2
PCWR-PM-PSB	3.95	0.1646 lb/hr	Condition 4.5.1
PCWR-SM-SD	31.87	1.3280 lb/hr	Condition 4.5.3
PCWR-SM-SDB	6.98	0.2907 lb/hr	Condition 4.5.3
PCWR-SM-CH	26.23	1.0929 lb/hr	Condition 4.5.3
PT	19.39	0.8079 lb/hr	Condition 4.5.3

3.9 Emissions shall not exceed the annual emission limits in Table 3-3. Unless otherwise required in this permit, compliance with these limits is determined by multiplying each emission factor in Table 3-3 (pounds per unit of operation) by the annual operation specified in Table 3-3, except as required in Condition 3.11.

Table 3-3 – Annual PM2.5 Emission Limits, tons per year

Emission Unit	Emission Limit	Emission Factor, units	Operation
LK-6	1.74	0.0510 lb/mbf lumber	Condition 4.2.2
PB-1	2.28	0.01488 lb/mlb steam	Condition 4.4.1
PB-2	3.10	0.00722 lb/mlb steam	Condition 4.4.1
PCWR-PM-SH	~~3.08~~1.01	~~0.8229~~0.00263 lb/~~hr~~mbf	Condition 4.5.4
PCWR-PM-SD	~~2.77~~0.90	~~0.7406~~0.00229 lb/~~hr~~mbf	Condition 4.5.4
PCWR-PM-PTB	0.62	0.1646 lb/hr	Condition 4.5.2
PCWR-PM-PSB	0.62	0.1646 lb/hr	Condition 4.5.1
PCWR-SM-SD	4.97	1.3280 lb/hr	Condition 4.5.3
PCWR-SM-SDB	1.09	0.2907 lb/hr	Condition 4.5.3
PCWR-SM-CH	4.09	1.0929 lb/hr	Condition 4.5.3
PT	2.52	0.8079 lb/hr	Condition 4.5.3

It is my impression that complying with the new PM2.5 limits for PCWR-PM-SD and PCWR-PM-SH will not be a problem for PotlatchDeltic as illustrated below:

PCWR-PM-SH

Effective daily planer throughput limit = (6.53 lb/day) * (mbf/0.00263 lb) = 2,483 mbf/day. During 2016-17, the highest daily planer throughput rate was 1,449 mbf/day. Effective annual planer throughput limit = (1.01 ton/yr) * (mbf/0.00263 lb) * (2000 lb/ton) = 768,061 mbf/yr. During 2016-17, the highest 12-month rolling total planer throughput was 210,776 mbf.

PCWR-PM-SD

Effective daily planer throughput limit = (5.77 lb/day) * (mbf/0.00229 lb) = 2,520 mbf/day. During 2016-17, the highest daily planer throughput rate was 1,449 mbf/day. Effective annual planer throughput limit = (0.90 ton/yr) * (mbf/0.00229 lb) * (2000 lb/ton) = 786,026 mbf/yr. During 2016-17, the highest 12-month rolling total planer throughput was 210,776 mbf.

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From: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>
Sent: Friday, November 20, 2020 11:21 AM
To: Meyer, Dan <Meyer.Dan@epa.gov>
Cc: Kyle Heitkamp <kheitkamp@ramboll.com>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>
Subject: RE: PotlatchDeltic Discussion

Yes, Monday or Tuesday would be best.

Jacob Odekirk
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From: Meyer, Dan <Meyer.Dan@epa.gov>
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To: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>
Cc: Kyle Heitkamp <kheitkamp@ramboll.com>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Shane Hammons <Shane.Hammons@PotlatchDeltic.com>; Bo Wilkins <bwilkins@bison-eng.com>
Subject: RE: PotlatchDeltic Discussion

[External Email] – Exercise caution with links and attachments.

Thanks Jacob. Let me get on this. During the call, Doug and I spoke of getting together with you again to explain next steps. That could happen as early as next week. Are you around next week?

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From: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>
Sent: Friday, November 20, 2020 10:49 AM
To: Meyer, Dan <Meyer.Dan@epa.gov>
Cc: Kyle Heitkamp <kheitkamp@ramboll.com>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Shane Hammons <Shane.Hammons@PotlatchDeltic.com>; Bo Wilkins <bwilkins@bison-eng.com>
Subject: RE: PotlatchDeltic Discussion

Dan,

Attached are the updated run sheets. I certainly had my doubts on whether Shane could locate these, but he was able to track down the data. "Input Boards" is lumber going into the planer.

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From: Meyer, Dan <Meyer.Dan@epa.gov>
Sent: Thursday, November 19, 2020 10:48 AM
To: Kyle Heitkamp <kheitkamp@ramboll.com>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Shane Hammons <Shane.Hammons@PotlatchDeltic.com>; Bo Wilkins <bwilkins@bison-eng.com>
Subject: RE: PotlatchDeltic Discussion

[External Email] – Exercise caution with links and attachments.

Thanks everyone for attending today's call. Based upon my understanding of the situation after knowledge gained during the call, R10 is requesting 03/17/20 planer throughput data for time periods highlighted in yellow.

EU: BH-2	Date: 03/17/20				
Run	RM201A Time Start/Finish Times	Port 1 Sampling Duration (min)	Port 1 Start/Finish Times (hr:min:sec)	Port 2 Sampling Duration (min)	Port 2 Start/Finish Times (hr:min:sec)
1	16:22 - 17:38	32.75	16:22:00 - 16:54:45	31.25	17:06:45 - 17:38:00
2	17:55 - 19:04	31.25	17:55:00 - 18:26:15	31.75	18:32:15 - 19:04:00
3	19:13 - 20:24	32.00	19:13:00 - 19:45:00	32.25	19:51:45 - 20:24:00

For each run, we need volume (bf) of lumber entering the planer during these two time periods.

EU: BH-3	Date: 03/17/20				
Run	RM201A Time Start/Finish Times	Port 1 Sampling Duration (min)	Port 1 Start/Finish Times (hr:min:sec)	Port 2 Sampling Duration (min)	Port 2 Start/Finish Times (hr:min:sec)
1	10:10 - 11:28	29.50	10:10:00 - 10:39:30	29.75	10:58:15 - 11:28:00
2	12:05 - 13:14	29.25	12:05:00 - 12:34:15	30.5	12:43:30 - 13:14:00
3	13:42 - 14:52	30.5	13:42:00 - 14:12:30	30.25	14:21:45 - 14:52:00

For each run, we need volume (bf) of lumber entering the planer during these two time periods.

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-----Original Appointment-----
From: Kyle Heitkamp <kheitkamp@ramboll.com>
Sent: Thursday, November 19, 2020 8:22 AM
To: Meyer, Dan; Hardesty, Doug; Jacob Odekirk (Jacob.Odekirk@PotlatchDeltic.com); Thomas Mosher; Shane Hammons; Bo Wilkins
Subject: PotlatchDeltic Discussion
When: Thursday, November 19, 2020 8:00 AM-8:30 AM (UTC-08:00) Pacific Time (US & Canada).
Where: Microsoft Teams Meeting

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